

**AFFIDAVIT IN SUPPORT OF ARREST WARRANT**

I, Wayne F. Eggleston, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since March of 2018. I am currently assigned to the FBI's Cleveland Division, Akron Resident Agency. As a Special Agent with the FBI, I investigate criminal matters related to White Collar Crime, Public Corruption, Violent Gangs, and Crimes against Children, including activities in violation of Federal Wire Fraud, Mail Fraud, and Bank Fraud statutes. I have completed FBI training in the proper handling of classified information, and have been involved in the execution of search warrants and seizing evidence from residences and other locations.

2. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. As will be shown below, there is probable cause to believe that SAMUEL GENE MCKOWN, with a birth year of 1998 and a social security number ending in 7246, has received, possessed, and distributed child pornography, in violation of 18 U.S.C. §§ 2252 and 2252A. I submit this application and affidavit in support of a criminal complaint charging SAMUEL GENE MCKOWN with violations of Title 18 §§ 2252 and 2252A.

4. The statements in this affidavit are based in part on information provided by the National Center for Missing & Exploited Children (NCMEC), Ohio Internet Crimes Against Children (ICAC), the Norton Police Department (NPD), and on my investigation of this matter. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I

have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that SAMUEL GENE MCKOWN committed violations of Title 18 §§ 2252 and 2252A

### **BACKGROUND OF THE INVESTIGATION**

5. This investigation was predicated upon an investigative referral from Drobox Incorporated to NCMEC on 07/25/2019, in reference to child pornography (possession, manufacture, and distribution). Dropbox Incorporated, commonly called Dropbox, is a file hosting service operated by the American company Dropbox Incorporated, headquartered in San Francisco, California, that offers cloud storage, file synchronization, personal cloud, and client software. It uses a smartphone's data plan or Wi-Fi to transmit and receive messages, photos, videos, sketches, mobile webpages, and other content. Dropbox may also be accessed via laptop and desktop computers by downloading emulator software applications to these devices, such as Android.
6. ICAC opened an investigation based on the Dropbox tip given to NCMEC. Through court orders, ICAC Investigators learned that approximately 75 videos of child pornography were uploaded to Dropbox Account User ID: 724923037 (the "Subject's Account"). Dropbox indicated that such account was associated to email address jandrews44203@gmail.com. Additionally, Dropbox identified multiple IP addresses that were used to utilize the Subject's Account. The Subject's Account was created on 12/21/2018 at 23:05 UTC, and utilized IP Address 2607:fcc8:9004:f200:a811:7fbe:1617:ae84.

7. On 09/05/2019, ICAC Investigator Crano requested a subpoena through the Cuyahoga County Prosecutor's Office, State of Ohio, for one of the IP Address identified by Dropbox as having utilized the Subject's Account. The IP Address was 2607:fcc8:900d:f800:a1bd:ebf2:92d3:2b8c on 05/25/2019 at 18:28 UTC. The subpoena was sent to Charter Communications requesting for Subscriber name, address, identity information, email addresses, profile URL's, user names, account or log-in names, or any other information pertaining to the identity of the Subscriber. Additionally, the subpoena requested IP address logs, connectivity data, login history, Subscriber's friend ID, unique URL, Subscriber's billing information, credit cards, bank account numbers associated with the account profile, types of services subscribed to or utilized by the Subscriber and the lengths of such services, and any and all information pertaining to the Subscriber's internet service, to include modem information and MAC addresses.
8. On 10/11/2019, Charter Communications responded to the subpoena for IP: 2607:fcc8:900d:f800:a1bd:ebf2:92d3:2b8c, indicating that the subscriber was JENNIE MCKOWN on McCoy Road in Norton, Ohio.
9. On 11/01/2019, NPD Detective Connell received the Dropbox tip from ICAC due to IP address IP: 2607:fcc8:900d:f800:a1bd:ebf2:92d3:2b8c, location resolving to NPD's area of responsibility.
10. NPD Detective Connell received from ICAC approximately 75 videos labeled "child pornography" that were uploaded to the Subject's Account on approximately 05/25/2019 utilizing IP address: 2607:fcc8:900d:f800:a1bd:ebf2:92d3:2b8c on 05/25/2019 at 18:28:02 UTC. NPD Detective Connell reviewed the following videos:

- a. Video 1\_4938509527591944246.mp4 – a prepubescent female, age 5-7, is performing oral sex on a white male.
- b. Video 1\_5156976152954273916.mp4 – a prepubescent female, age 7-9, is performing oral sex on a male. Additionally, the female is being vaginally penetrated both digitally and by a foreign object.
- c. Video 1\_5157128804681908343.mp4 a prepubescent female, age 5-7 is being vaginally penetrated by a male penis.

11. On 11/04/2019, NPD Detective Connell sent a subpoena through the Barberton Municipal Court, State of Ohio, to Google L.L.C. for jandrews44203@gmail.com. NPD Detective Connell requested Subscriber information, phone numbers, mailing address, and the most recent connection IP address.
12. On 11/15/2019, Google L.L.C responded to the subpoena for email account [jandrews44203@gmail.com](mailto:jandrews44203@gmail.com), with the following information:

a.	Name: JACK ANDREWS
b.	Email: <a href="mailto:jandrews44203@gmail.com">jandrews44203@gmail.com</a>
c.	Created on: 12/21/2017 at 23:05:29 UTC
d.	Terms of service IP: 2607:fcc8:9004:f200:a811:7fbe:1617:ae84
e.	Google Account ID: 126074827931
f.	Last Login: 09/05/2019 at 04:34:21 UTC

13. On 11/12/2019, NPD Detective Connell sent a subpoena through the Barberton Municipal Court, State of Ohio, to Verizon Wireless for an IP address identified as having utilized the Subject's Account. The subpoena requested any and all information



relating to Subscriber information for IP Addresses:

2600:1009:B067:82CF:5825:F316:CD48:1EF6, on 07/17/2019 at 19:58:17 GMT.

Verizon Wireless responded to the subpoena indicating that the subscriber was

WILLIAM MCKOWN on Brown Street in Akron, Ohio.

14. Public records indicate that WILLIAM MCKOWN is the biological father of SAMUEL GENE MCKOWN.
15. On 11/12/2019, NPD Detective Connell sent a search warrant through the Barberton Municipal Court, State of Ohio, to Dropbox Incorporated for a search of all photos, videos uploaded, sent, stored, upload dates, times, and IP addresses belonging to the Subject's Account.
16. On 11/15/2019, legalcompliance@Dropbox.com responded to NPD Detective Connell's search warrant. [legalcompliance@Dropbox.com](mailto:legalcompliance@Dropbox.com) provided a file that contained approximately 9.58 gigabytes of material for the Subject's Account. The following information was contained in the file provided by legalcompliance@Dropbox.com

a.	Name: JACK ANDREWS
b.	EMAIL: <a href="mailto:jandrews44203@gmail.com">jandrews44203@gmail.com</a>
c.	User ID: 724923037
d.	File Name: Private – contained 436 images & 50 videos
e.	File Name: Videos CP – Contained 545 videos
f.	File Name: nrw – contained 2 videos

17. On 11/26/2019, NPD Detective Connell sent subpoenas through the Barberton Municipal Court, State of Ohio, to Charter Communications, Inc. for Subscriber information for the following IP Addresses identified by Dropbox and used to utilize the Subject's Account.
  - a. 2607:FCC8:9004:F200:A811:7FBE:1617:AE84, on 12/21/2017 at 23:05:29 UTC.
  - b. 2607:FCC8:900D:F800:C63:EA70:3E09:26AF, on 02/23/2019 at 06:36:36 GMT
  - c. 2607:FCC8:900D:F800:CED:8312:DC30:2F1F, on 04/05/2019 at 20:42:42 GMT
18. On 11/27/2019, Charter Communications responded to the subpoena for all the three identified IP Addresses indicating that the subscriber was JENNIE MCKOWN on McCoy Road in Norton, Ohio.
19. NPD Detective Connell reviewed the following videos obtained by the Dropbox search warrant return. The below is the summary of the videos reviewed by NPD Detective Connell:
  - a. Video 1\_954478446275198977.mp4 a prepubescent female, age 4-6 penetrates her vagina with her own digits. A male penis then attempts to penetrate the prepubescent female's vagina where she states, "it is not going in."
  - b. Video 1\_4907153466012467241.mp4 a prepubescent female, age 5-7 performs oral sex on a male penis.
  - c. Video 1\_4911454931593986194.mp4 a prepubescent female, age 5-7 is vaginally penetrated by a male penis.
  - d. Video 1\_4956319399758790856.mp4 a prepubescent female, age 5-7 is anally penetrated by a male penis.
  - e. Video 1\_361628012870896210.mp4 an infant female, 2-3 is penetrated by a male penis.
  - f. Video 1\_361628012870896213.mp4 an infant female, 2-3 is penetrated by a male penis.
20. Between 12/05/2019 and 12/08/2019, FBI Special Agent Eggleston reviewed an external hard drive of the search warrant returns for the Subject's Account, which were provided by NPD Detective Connell. FBI SA Eggleston reviewed all of the videos and images contained on the external hard drive. Each of them depicted a child in a state of nudity

and/or engaging in sexual activity and/or masturbation. Most of the videos depicted female children. Several videos depicted prepubescent children, with some videos depicting toddler aged female children. A small sampling of the videos is as follows:

- a. **1\_284948737669728115** – A video that is approximately 55 seconds (0:55) in length. The video depicts a prepubescent female child (approximately 4-5 years of age) laying on a bed fully nude on her back.
- b. **1\_361628012870896172** – A video that is approximately 1 minute and 10 seconds (1:10) in length. The video depicts a prepubescent female child (approximately 8-9 years of age) laying on her hands and knees. The child is nude from the waist down. An adult male is straddling over the child, and has sexual intercourse with the child.
- c. **1\_499977344790823168** – A video that is approximately 12 second (0:12) in length. The video depicts a prepubescent female child (approximately 12-13 years of age) laying on her back. The child is nude from the waist down, and her vagina a buttocks is visible. An adult male is straddling over the child, and has sexual intercourse with the child.
- d. **1\_848809657949487275** – A video that is approximately 3 minutes and 53 seconds (3:53) in length. The video depicts a prepubescent female child (approximately 12-13 years of age) fully clothed. The child then removes her clothing and is observed fully nude. The child lays on her back fully nude on a couch and masturbates.
- e. **1\_4902409060453711930** – A video that is approximately 1 minute and 16 seconds (1:16) in length. The video depicts a prepubescent female child

(approximately 12-13 years of age) on her hands and knees. The child is nude from the waist down, and her vagina and buttocks is visible. An adult male is straddling over the child, and has sexual intercourse with the child.

- f. **1\_4904665013500772404** – A video that is approximately 53 minutes (53:00) in length. The video depicts a prepubescent female child (approximately 10-11 years in age) performing oral sex on a dildo. The video then switches to the child performing oral sex on an adult male. The video then switches to an adult male straddling over the child, and has sexual intercourse with the child. The video then switches to the male digitally penetrating the child with his fingers.

21. Open Source checks revealed SAMUEL GENE MCKOWN, with a birth year of 1998, home address on McCoy Road in Norton, Ohio, and a cellular telephone number of 330-907-4220.
22. On 12/08/2019, at approximately 4:00 PM, EST, FBI SA Eggleston drove by MCOWN's home on McCoy Road in Norton, Ohio, and observed a 2015 Black Honda Pilot SUV parked in the driveway. FBI SA Eggleston later confirmed through Ohio BMV records that this vehicle is actively registered to JENNIE CADWELL. FBI SA Eggleston also observed a 2009 Black Ford F-150 Truck parked in the driveway. FBI SA Eggleston later confirmed through Ohio BMV records that this vehicle is actively registered to JAMES MICHAEL CADWELL.
23. On 12/09/2019, I confirmed through Ohio Bureau of Motor Vehicle (BMV) records that SAMUEL GENE MCKOWN resided on McCoy Road in Norton, Ohio.
24. On 12/09/2019, I confirmed through BMV that a 2013 black Chevrolet Tahoe SUV was registered to SAMUEL GENE MCKOWN, with a birth year of 1998.



25. On 12/09/2019, I confirmed through the University of Akron Police Department (UAD) Detective Jason Hill that SAMUEL GENE MCKOWN had been enrolled as a student at the Akron University since approximately 2016. University of Akron records indicate that SAMUEL GENE MCKOWN resided on McCoy Road in Norton, Ohio, 44203 with a cellular telephone number of 330-907-4220.
26. Additionally, UAD Detective Hill informed that JACK HENRY ANDREWS, with a birth year of 1998 and a social security number ending in 4017, was a student at the University of Akron in the Fall of 2017 through Spring of 2018.
27. On 12/09/2019, at approximately 3:20 PM, EST, NPD Detective Connell drove MCKOWN's home on McCoy Road in Norton, Ohio and observed SAMUEL GENE MCKOWN parking a 2013 Black Chevrolet Tahoe SUV in the driveway. FBI SA Eggleston later confirmed through Ohio BMV records that this vehicle is actively registered to SAMUEL GENE MCKOWN.
28. On 12/10/2019, I also queried the Norton Police Department in Norton, Ohio, for any records of contact for SAMUEL GENE MCKOWN, JENNIE MCKOWN aka JENNIE CADWELL, and JAMES MICHAEL CADWELL associated with the address on McCoy Road in Norton, Ohio. I was advised that JENNIE MCKOWN aka JENNIE CADWELL contacted Norton Police Department on 08/23/2014 for abdominal pain. Additionally JENNIE MCKOWN aka JENNIE CADWELL made contact with Norton Police Department on 11/06/2015 for reported damage to her rental house located on McCoy Road in Norton, Ohio. There was an additional Norton Police Department incident concerning SAMUEL GENE MCKOWN on 05/28/2016. During the incident SAMUEL GENE MCKOWN provided Norton Police Department with his cellular telephone

number 330-907-4220. Additionally, SAMUEL GENE MCKOWN advised that his mother JENNIE MCKOWN aka JENNIE CADWELL's cellular telephone number was 330-907-3786.

29. On 01/06/2020, members of the FBI Akron Resident Agency, ICAC, and NPD conducted a search warrant on McCoy Road in Norton, Ohio. SAMUEL GENE MCKOWN (hereinafter: SAM) with a birth year of 1998 and a social security number ending in 7246, volunteered to provide statements to FBI Special Agents. SAM advised that his cellular telephone number was 330-907-4220. SAM advised that he was the only individual who utilized cellular telephone number 330-907-4220.
30. SAM admitted to creating Google email address [jandrews44203@gmail.com](mailto:jandrews44203@gmail.com) at his residence on McCoy Road in Norton, Ohio. SAMUEL GENE MCKOWN admitted to using the Google email address [jandrews44203@gmail.com](mailto:jandrews44203@gmail.com) to create Dropbox Account User ID: 724923037. When FBI Special Agents asked SAM why he utilized JACK ANDREWS as a user name for Dropbox Account User ID 724923037, SAM explained that he went to high school with JACK ANDREWS, and the two graduated from Norton High School in 2017. SAM had not spoken with JACK ANDREWS since high school.
31. SAM utilized an internet application iFunny which is a collection of videos / GIFs / memes. Users of iFunny are able to find friends in the comment sections and build their own meme collections. Using iFunny, SAM was able to locate child pornography, and then download the child pornography files utilizing Dropbox Account User ID: 724923037. SAM would then search the downloaded files of child pornography for the videos he preferred.

32. SAM admitted to downloading less than 100 videos of child pornography utilizing Dropbox Account User ID: 724923037, which utilized google email account jandrews44203@gmail.com. SAM admitted to masturbating approximately 25 times to videos that contained juvenile children ages 10 to 12 years of age.
33. On 01/06/2020, a search of SAM's Apple I-phone, cellular telephone number 330-907-4220 was conducted by ICAC. ICAC found a MEGA application, which is a cloud storage and file hosting service offered by MEGA limited, an Auckland based company. SAM admitted to FBI Special Agents that he utilized MEGA to watch child pornography. SAM explained that he would obtain child pornography from iFunny, and copy and paste the child pornography URL into MEGA. SAM explained that he once you copied and pasted the child pornography URL into MEGA, the child pornography would be able to be viewed by the user. SAM admitted that he had utilized MEGA to view child pornography as recent as December of 2019.
34. On 01/06/2020, FBI SA Wayne Eggleston reviewed the ICAC triage computer disc of SAM's Apple I-phone, cellular telephone 330-907-4220. Located on the ICAC triage computer disc was the following.
  - a. IMG\_7208 – an image that depicts prepubescent female child (approximately 8 years in age) naked on her back. The female child has her legs spread
  - b. IMG\_7209 – an image an image that depicts prepubescent female child (approximately 8 years in age) naked on her back. The female child has her legs spread.
  - c. IMG\_7211 - an image an image that depicts prepubescent female child (approximately 7-8 years in age) on her hands and knees. An adult male is

standing over the top of the female child. The adult male is digitally penetrating the female child's anus.

- d. IMG\_7212 - an image an image that depicts prepubescent female child (approximately 7years in age) is fully nude. The female child is performing oral sex on an adult male. The female child is digitally penetrated by a second adult male.
- e. IMG\_7213 - an image an image that depicts prepubescent female child (approximately 7years in age) fully nude. The female child is being digitally penetrated by an adult male.

### CONCLUSION

Based on the above information, there is probable cause to believe that SAMUEL GENE MCKOWN committed violations of Title 18 §§ 2252 and 2252A.



Wayne F. Eggleston  
Special Agent  
Federal Bureau of Investigation

Sworn to via telephone after  
submission by reliable electronic  
means. Crim.Rules. 4.1; 41(d)(3)



Thomas M. Parker  
United States Magistrate Judge  
3:59 PM, Jan 6, 2020